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11 Attorneys for Plaintiff ROHINI KUMAR

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 OAKLAND DIVISION

16 ROHINI KUMAR, an individual, on behalf
of herself, the general public and those
17 similarly situated,

18 Plaintiff,

19 v.

20 SALOV NORTH AMERICA CORP.,

21 Defendant.
22

CASE NO. 4:14-cv-02411-YGR

ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF PLAINTIFF'S MOTION FOR
CLASS CERTIFICATION AND
SUPPORTING DECLARATIONS

Date: April 12, 2016

Time: 2:00 p.m.

Courtroom 1

Hon. Judge Yvonne Gonzalez Rogers

1 Pursuant to Local Rule 79-5(d), Plaintiff Rohini Kumar respectfully files this
2 administrative motion to seal certain portions of the following documents:

3 Plaintiff's Motion for Class Certification

4 Declaration of Kristen G. Simplicio, including supporting exhibits

5 Declaration of Colin Weir, including supporting exhibits.

6 These documents contain information designated as confidential or highly confidential by
7 Defendant or third party Information Resources, Inc. ("IRI") pursuant to the protective order
8 entered in this case. Specifically, information derived from material designated highly
9 confidential by IRI appears at: (1) Page 7, line 20 of Plaintiff's Motion for Class Certification;
10 and (2) Paragraphs 49, 57, 59-63, and 74, and Tables 1-3 of the Declaration of Colin Weir. This
11 information is highlighted for this Court in blue. All other material that Plaintiff seeks to seal has
12 been designated confidential or highly confidential by Defendant and is highlighted in yellow.

13 Plaintiffs make this motion at the request of Defendant and IRI pursuant to Civil Local
14 Rules 7-11 and 79-5. In accordance with the local rules, Defendant and IRI will identify the
15 specific portions of the Motion Papers that they seek to seal and which remaining portions can be
16 filed in a redacted public version. Defendant and IRI will also provide in a separate filing, as
17 provided by the local rules, the evidentiary basis for its request to seal and a proposed order.
18 Plaintiffs reserve the right to oppose portions of their requests that exceed the scope of the
19 protective order and applicable law.

20 Dated: January 19, 2016

GUTRIDE SAFIER LLP

21 By: /s/ Kristen Simplicio

22 Adam J. Gutride

23 Seth A. Safier

Kristen G. Simplicio

24 100 Pine Street, Suite 1250

San Francisco, California 94111

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PROOF OF SERVICE

I, Kristen G. Simplicio, declare:

My business address is 100 Pine Street, Suite 1250, San Francisco, California. I am employed in the County of San Francisco. I am over the age of 18 years and not a party to the within cause.

On January 19, 2016 I served the following documents:

**PLAINTIFF'S MOTION FOR CLASS CERTIFICATION
DECLARATION OF KRISTEN SIMPLICIO
DECLARATION OF COLIN WEIR
DECLARATION OF ADAM GUTRIDE
DECLARATION OF HASSAN ZAVAREEI
PLAINTIFF'S ADMINISTRATIVE MOTION TO SEAL
DECLARATION OF KRISTEN SIMPLICIO IN SUPPORT OF PLAINTIFF'S
ADMINISTRATIVE MOTION TO SEAL
[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION TO SEAL**

on the following person(s) in this action by placing a true copy thereof as follows:

Mark E. Haddad
Sean A. Commons
Nitin Reddy
Jaya C. Gupta
SIDLEY AUSTIN LLP
555 West Fifth Street, Suite 4000
Los Angeles, California 90013

mhaddad@sidley.com
scommons@sidley.com
nreddy@sidley.com
jaya.gupta@sidley.com

In addition, on January 19, 2016 I served the following documents:

**PLAINTIFF'S MOTION FOR CLASS CERTIFICATION¹
DECLARATION OF COLIN WEIR
PLAINTIFF'S ADMINISTRATIVE MOTION TO SEAL
DECLARATION OF KRISTEN SIMPLICIO IN SUPPORT OF PLAINTIFF'S
ADMINISTRATIVE MOTION TO SEAL
[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION TO SEAL**

on the following person(s) in this action by placing a true copy thereof as follows:

¹ As Information Resources, Inc. and its counsel are not parties to the protective order, the version of the Motion for Class Certification and the Declaration of Colin Weir served on the company was redacted to protect the information designated confidential or highly confidential by Defendant Deoleo USA, Inc.

1 David Becker
2 Freeborn & Peters LLC
3 311 South Wacker Drive
4 Suite 3000
5 Chicago, IL 60606
6 E-mail: dbecker@freeborn.com

7 [x] BY E-MAIL. I caused said documents to be transmitted to the email address
8 indicated.

9 I declare under penalty of perjury under the laws of the State of California that the
10 foregoing is true and correct and that this document was executed on January 19, 2016, at
11 Berkeley, California.

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Kristen G. Simplicio, Esq.